

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: EDWARD FITGERALD HEARNS
WANDA JEAN HEARNS

CHAPTER 13
CASE NO.15-50125-KMS

MOTION TO AMEND CHAPTER 13 PLAN

COME NOW, debtors and file this Motion to Amend their Chapter Plan as follows:

1. That the debtors hereby amends their Chapter 13 Plan to show that child support is being paid, and to whom it is being paid.
2. That the debtors also amend their plan to pay Pioneer Credit as a secured creditor with a 1985 Chevy P.U., and pay the FMV of \$500.00. That the unsecured difference will be paid 100% as all other unsecured creditors.
3. Debtors request that the Chapter 13 trustee amend the wage order to change plan payment, if necessary, to cover the proposed amendment to the Chapter 13 Plan.

WHEREFORE, the Debtors pray that their Chapter 13 plan be modified as set forth above.

RESPECTFULLY submitted, this the 26th day of February, 2015.

/s/ Tylvester O. Goss
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